

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

TEAIRRA PURVIS, individually,)
and on behalf of her minor child,) Case No. 1:20-CV-02277 (LMM)
J.A., and ARAMAH JOHNSON,)
and on behalf of all others similarly)
situated,)
Plaintiffs,) **MOTION FOR FINAL**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT**
)
vs.)
)
)
AVEANNA HEALTHCARE, LLC,)
)
Defendant.)
)
)

Plaintiffs Teairra Purvis, individually, and on behalf of her minor child, J.A., and Aramah Johnson, individually and behalf of others similarly situated (“Plaintiffs”) hereby move this Court for final approval of the class action settlement preliminarily approved by this Court on June 9, 2022. Plaintiffs respectfully request that this Court:

- a. Grant final certification of the Settlement Classes, appoint Plaintiffs Teairra Purvis, individually, and on behalf of her minor child, J.A., and Aramah Johnson as Class Representatives and appoint David K. Lietz

and Gary M Klinger of Milberg Coleman Bryson Phillips Grossman, as
Class Counsel;

- b. Approve the requested attorneys' fees and expenses in the amounts of \$357,500;
- c. Find that the Notice met the requirements of due process and Federal Rule of Civil Procedure 23;
- d. Find that the terms of the Settlement Agreement fair, reasonable, and adequate and approved, adopted, and incorporated by the Court;
- e. Direct the Parties, their respective attorneys, and the Claims Administrator to consummate the Settlement in accordance with the Court Order and the terms of the Settlement Agreement, and;
- f. Resolve all claims against all parties in this Action and issue the Proposed Final Approval Order.

This Motion is based on the Supporting Memorandum filed herewith; the Settlement Administrator Declaration of Omar Silva of KCC Class Action Services LLC ("KCC") in Support of Final Approval filed herewith; the Declaration of David K. Lietz in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement filed herewith; the Settlement Agreement entered into between the parties as well as the Notices issued to the Class at ECF 72-2; Plaintiffs' Motion for

Preliminary Approval of Class Action Settlement, Supporting Memorandum, Supporting Declaration, and Firm Resumes at ECF 72, 72-1, 72-2 and 72-3; and Plaintiffs' Motion for Approval of Attorneys' Fees, Expenses, and Service Awards and accompanying documents at ECF 76 and; all other pleadings and papers on file in this action; and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for October 18, 2022.

Wherefore, premises considered, Plaintiffs request that this Court grant this motion and grant the motion for attorneys' fees, costs, and service awards (ECF No. 76).

Dated: September 27, 2022

Respectfully submitted,

/s/ David K. Lietz

David K. Lietz (*admitted pro hac vice*)

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*Attorneys for Plaintiffs
and the Proposed Class*

CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing has been prepared in Times New Roman 14 point, one of the fonts and points approved by the Court in LR 5.1(C), with a top margin of not less than 1.5 inches and a left margin of not less than 1 inch.

/s/ David K. Lietz

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2022, I caused a true a correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

/s/ David K. Lietz